

Exhibit B

From: Helen Chaitman <hchaitman@chaitmanllp.com>
Sent: Monday, March 2, 2020 11:09 AM
To: Proano, David <dproano@bakerlaw.com>
Cc: Crook, Darren <dcrook@bakerlaw.com>; Prabucki, Kenneth G. <kprabucki@bakerlaw.com>
Subject: RE: Mediation of Adv. Pros. 10-04327 (Gertrude Alpern Trust), 10-04292 (Robert Roman) and 10-04302 (Joan Roman)

Hi David: My clients are willing to try a mediation but we would like to use Hurkin-Torres. I am using him on a mediation with Marie Carlisle.

Helen Davis Chaitman
Chaitman LLP
465 Park Avenue
New York, New York 10022
hchaitman@chaitmanllp.com
Cell: (908) 303-4568
Fax: (888) 759-1114

From: Proano, David [<mailto:dproano@bakerlaw.com>]
Sent: Monday, March 02, 2020 10:28 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Crook, Darren <dcrook@bakerlaw.com>; Prabucki, Kenneth G. <kprabucki@bakerlaw.com>
Subject: Re: Mediation of Adv. Pros. 10-04327 (Gertrude Alpern Trust), 10-04292 (Robert Roman) and 10-04302 (Joan Roman)

Helen: Just following up on this.

Thanks,

David Proano
Baker & Hostetler LLP
Direct Dial: 216-861-7834

On Feb 6, 2020, at 7:12 PM, Helen Chaitman <hchaitman@chaitmanllp.com> wrote:

[External Email: Use caution when clicking on links or opening attachments.]

I will ask them.

Helen Davis Chaitman
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From: Proano, David [<mailto:dproano@bakerlaw.com>]
Sent: Thursday, February 06, 2020 4:21 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Crook, Darren <dcrook@bakerlaw.com>; Prabucki, Kenneth G.
<kprabucki@bakerlaw.com>
Subject: Mediation of Adv. Pros. 10-04327 (Gertrude Alpern Trust), 10-04292 (Robert Roman) and 10-04302 (Joan Roman)

Helen,

I am writing about the following pending BLMIS avoidance actions:

- Gertrude E. Alpern Rev. Trust –Adv. Pro. No. 10-04327
- Robert Roman – Adv. Pro. No. 10-04292
- Joan Roman – Adv. Pro. No. 10-04302

We would like to see if any of your clients in these matters would be amenable to a mediation to discuss a potential resolution of the claims at issue. Please let us know.

Thanks,

David

David Proaño

Partner

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<image002.jpg>
<image003.jpg>

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From: Helen Chaitman <hchaitman@chaitmanllp.com>
Date: March 4, 2020 at 9:14:31 AM GMT+1
To: "Markel, Tatiana" <tmarkel@bakerlaw.com>
Cc: Jennifer Allim <jallim@chaitmanllp.com>
Subject: RE: Mediation

No, you are not authorized to sign on my behalf. My clients are not interested in mediating with any of the mediators the Trustee has been using. We will mediate with Mr. Hurkin-Torres. If you change the notices to provide that Mr. Hurkin-Torres is the mediator, we will approve.

Helen Davis Chaitman
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From: Markel, Tatiana [mailto:tmarkel@bakerlaw.com]
Sent: Tuesday, March 03, 2020 6:31 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Jennifer Allim <jallim@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>
Subject: RE: Mediation

Helen, attached for your review are notices of mediation referral for the four cases listed below. Please let us know if we are authorized to e-sign on your behalf and file.

Thanks!

Tatiana Markel
Partner

[REDACTED]
45 Rockefeller Plaza
New York, NY 10111-0100
T +1.212.589.4615

tmarkel@bakerlaw.com
bakerlaw.com



From: Helen Chaitman <hchaitman@chaitmanllp.com>
Sent: Monday, March 02, 2020 1:44 PM
To: Markel, Tatiana <tmarkel@bakerlaw.com>
Cc: Jennifer Allim <jallim@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>
Subject: RE: Mediation

[External Email: Use caution when clicking on links or opening attachments.]

So long as we can agree on a mediator, I would be happy to schedule these cases for mediation.

Helen Davis Chaitman
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From: Markel, Tatiana [<mailto:tmarkel@bakerlaw.com>]
Sent: Monday, March 02, 2020 1:21 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Jennifer Allim <jallim@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>
Subject: Mediation

Dear Helen:

The following cases are ready to proceed to mediation:

10-04469 Picard v. Carol L. Kamenstein
10-04491 Picard v. Elaine Dine Living Trust
10-04648 Picard v. Peter D. Kamenstein
10-04753 Picard v. Ginsburg

Please let us know your availability in the coming few months. Provided you're available, we will send over a list of potential mediators.

Thanks!

Best,
Tatiana

Tatiana Markel
Partner

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tmarkel@bakerlaw.com
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From: [Helen Chaitman](#)
To: [Carlisle, Marie L.](#)
Cc: [Cremona, Nicholas J.](#); [Hunt, Dean D.](#)
Subject: RE: Adv. Pro. No. 10-04428, Estate of Allen Meisels Mediation
Date: Wednesday, March 4, 2020 12:16:05 PM

I don't feel these former bankruptcy judges would be impartial. We could ask Hurkin-Torres if there is anyone he would recommend, if he can't accommodate us.

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From: Carlisle, Marie L. [mailto:mcarlisle@bakerlaw.com]
Sent: Friday, February 28, 2020 4:05 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Cremona, Nicholas J. <ncremona@bakerlaw.com>; Hunt, Dean D. <dhunt@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10-04428, Estate of Allen Meisels Mediation

Helen,

Below are three former Bankruptcy judges in the NY/NJ area from the Court's Mediator Registry that have not mediated any of our good faith cases.

Robert E. Gerber
Raymond T. Lyons
Donald Steckroth

Please let us know whether you are amenable to using any of these as mediators. Links to the biographies and experience as a mediator can be found at the below link to the Registry.

<http://www.nysb.uscourts.gov/register-mediators>

Marie

From: Helen Chaitman <hchaitman@chaitmanllp.com>
Sent: Wednesday, February 26, 2020 3:33 PM
To: Hunt, Dean D. <dhunt@bakerlaw.com>
Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Cremona, Nicholas J. <ncremona@bakerlaw.com>
Subject: Re: Adv. Pro. No. 10-04428, Estate of Allen Meisels Mediation

It would be very helpful to give me some other recommendations.

Sent from my iPhone

On Feb 26, 2020, at 11:52 AM, Hunt, Dean D. <dhunt@bakerlaw.com> wrote:

Would it do any good for me to send you any more recommendations? Or is it your position that you will only mediate with Mr. Harkin-Torres? We need to get these mediations running in parallel or we will never get them finished. Please let me know.

Thanks

From: Helen Chaitman <hchaitman@chaitmanllp.com>
Sent: Wednesday, February 26, 2020 10:48 AM
To: Hunt, Dean D. <dhunt@bakerlaw.com>
Cc: Carlisle, Marie L. <mcarlisle@bakerlaw.com>; Cremona, Nicholas J. <ncremona@bakerlaw.com>
Subject: Re: Adv. Pro. No. 10-04428, Estate of Allen Meisels Mediation

I would like to stick with Harkin-Torres at this point.

Sent from my iPhone

On Feb 26, 2020, at 11:16 AM, Hunt, Dean D. <dhunt@bakerlaw.com> wrote:

Following up on this. Thanks

From: Hunt, Dean D.
Sent: Friday, February 21, 2020 5:58 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>; Carlisle, Marie L. <mcarlisle@bakerlaw.com>
Cc: Cremona, Nicholas J. <ncremona@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10-04428, Estate of Allen Meisels Mediation

From: Helen Chaitman <hchaitman@chaitmanllp.com>
Sent: Friday, February 21, 2020 5:52 PM
To: Carlisle, Marie L. <mcarlisle@bakerlaw.com>
Cc: Hunt, Dean D. <dhunt@bakerlaw.com>; Cremona, Nicholas J. <ncremona@bakerlaw.com>
Subject: Re: Adv. Pro. No. 10-04428, Estate of Allen Meisels Mediation

My clients do not want to spend the money to mediate unless it is worthwhile. My prior experience with the mediators on your list proved that the process was a waste of time. I will look into Steckroth and get back to you.

Sent from my iPhone

On Feb 21, 2020, at 6:45 PM, Carlisle, Marie L.
<mcarlisle@bakerlaw.com> wrote:

Helen,

Waiting to see if we both feel that Hurkin-Torres is effective will unreasonably delay these cases. We believe the other mediators offered would all be fair and push equally on both sides, and we reserve the option to ask the Court to appoint them (as well as mediators on the approved list) for your remaining Good Faith Cases.

We have not, however, used Donald Steckroth to mediate any of our cases. Please let us know if you will consent to using him to mediate another of your cases.

Thanks,

Marie

From: Helen Chaitman <hchaitman@chaitmanllp.com>
Sent: Friday, February 21, 2020 5:12 AM
To: Carlisle, Marie L. <mcarlisle@bakerlaw.com>
Cc: Hunt, Dean D. <dhunt@bakerlaw.com>; Cremona, Nicholas J. <ncremona@bakerlaw.com>
Subject: RE: Adv. Pro. No. 10-04428, Estate of Allen Meisels
Mediation

[External Email: Use caution when clicking on links or opening attachments.]

I want to wait and see if we both feel that Hurkin-Torres is effective. None of the mediators on your list (to my knowledge) has encouraged a compromise; the mediators all

simply take the Trustee's unbending position. That is not a productive use of our time because my clients are not going to pay the full two-year number. If they were willing to do that, they would have settled a long time ago. If I knew of someone who has as good a reputation as Hurkin-Torres, I would suggest him/her.

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From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]
Sent: Friday, February 14, 2020 12:39 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Hunt, Dean D. <dhunt@bakerlaw.com>; Cremona, Nicholas J. <ncremona@bakerlaw.com>
Subject: Adv. Pro. No. 10-04428, Estate of Allen Meisels
Mediation

Helen,

Attached is a draft Notice of Mediation Referral and Mediator Selection for your review and approval in the Meisels case. As you'll see in the Notice, we agree to use Judge Hurkin-Torres for this case and the Notice includes a footnote about the fact that the parties have agreed to mediate with him even though he is not on the Court's Mediator Registry. If you are fine with the Notice, I will go ahead and have it filed. I will then reach out to Judge Hurkin-Torres' case manager about availability so that we can work together to get that scheduled.

I also wanted to touch base about scheduling mediation in the remainder of your cases. First, I wanted to see if you have any cases you believe should be mediated first or which you believe are better suited for mediation. If so, let me know and we can work to schedule those first.

Second, given the number of cases and the fact we don't anticipate mediating Meisels until late March or early April, we propose that both sides identify additional mediators from the registry so that we can start getting some of our

other cases scheduled for mediation, rather than waiting until after we've mediated Meisels. If both parties like Hurkin-Torres, we would agree to use him on other matters, but we think it would be more efficient to go ahead and select additional mediators now so that we can get others on the schedule rather than waiting. Additionally, it will be logistically difficult to work with only one mediator given the total number of cases.

We propose the following mediators from the Court's registry and welcome any additional mediators you would like to propose. I've included a link to the Court's registry below so that you can see their bios.

Donald Steckroth
Robert Gerber
Arthur Gonzalez
Robert Rosenberg
Richard David

<http://www.nysb.uscourts.gov/register-mediators>

I'm happy to have a call if you prefer to discuss our proposal for moving forward with the remaining cases, as well as these mediators and any mediators that you propose.

Marie

Marie Carlisle
Partner

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<image003.jpg>

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